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July 29, 2016

VIA ECF

Honorable Debra Freeman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Rosario v. Mis Hijos Deli Corp, et. al.,
15 CV 6049 (LTS)(DF)

Dear Magistrate Judge Freeman:

This firm represents the Plaintiff in the above-referenced action brought against Defendants for wage violations under the FLSA and NYLL. I write this letter to provide the Court with an update regarding discovery proceedings in this matter.

As of today, the depositions of Plaintiff, as well as Defendants Leonida Collado, Junior Palma, Palma Grocery Corp. (by Leonida Collado) and Mis Hijos Deli Corp. (by Junior Palma) have been completed subject to the additional requests below. The deposition of Defendant Jose Palma, who resides in the Dominican Republic, must still be arranged. I anticipate finalizing plans for Jose Palma's deposition next week. Defendants have not yet indicated whether they will be producing someone other than Defendant Jose Palma to testify on behalf of Defendant 251 E. 123rd St. Realty LLC.

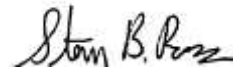
Further, based upon the deposition testimony of Leonida Collado and Junior Palma, I have also served a subpoena to testify at a deposition and produce documents upon Mund Business Services, Inc. This deposition is noticed for August 11.

Also based upon the deposition testimony of Leonida Collado and Junior Palma, there are corporate documents and tax documents relating to Palma Grocery Corp. and Mis Hijos Deli

Corp. that were not yet produced. Defendants have agreed to produce those documents. Pending a review of the unproduced tax documents, Plaintiff has reserved the right to further depose Defendants Leonida Collado and Junior Palma at a future date.

Plaintiff also requests permission to serve additional discovery demands upon Defendants in light of the deposition testimony of Leonida Collado and Junior Palma. Plaintiff requests permission to serve such demands by August 12.

Respectfully,

A handwritten signature in black ink, appearing to read "Steven B. Ross". The signature is written in a cursive, flowing style.

STEVEN B. ROSS